

IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF TEXAS  
MARSHALL DIVISION

TQ DELTA, LLC,

*Plaintiff,*

v.

COMMSCOPE HOLDING COMPANY, INC.,  
COMMSCOPE INC., ARRIS  
INTERNATIONAL LIMITED, ARRIS  
GLOBAL LTD., ARRIS US HOLDINGS, INC.,  
ARRIS SOLUTIONS, INC., ARRIS  
TECHNOLOGY, INC., and ARRIS  
ENTERPRISES, LLC

*Defendants.*

CIV. A. NO. 2:21-CV-310-JRG  
(Lead Case)

TQ DELTA, LLC,

*Plaintiff,*

v.

NOKIA CORP., NOKIA SOLUTIONS AND  
NETWORKS OY, and NOKIA OF AMERICA  
CORP.,

*Defendants.*

CIV. A. NO. 2:21-CV-309-JRG  
(Member Case)

**DEFENDANTS' NOTICE OF REQUEST FOR HEARING ON DEFENDANTS' SECOND  
OPPOSED MOTION FOR ENTRY OF ORDER FOCUSING PATENT CLAIMS  
(DKT. NO. 243)**

Defendants Nokia of America Corporation, Nokia Corporation, and Nokia Solutions and Networks, Oy (collectively, "Nokia"), and CommScope Holding Company, Inc., CommScope Inc., ARRIS International Limited, ARRIS Global Ltd., ARRIS US Holdings, Inc., ARRIS Solutions, Inc., ARRIS Technology, Inc., and ARRIS Enterprises, LLC (collectively, "CommScope") respectfully request that Defendants' Second Opposed Motion

for Entry of Order Focusing Patent Claims be added to the agenda for this Thursday's conference. Dkt. No. 243.

The Court has currently scheduled a hearing for Thursday, September 1, 2022, at 1:30pm to address discovery disputes between TQ Delta, LLC and Defendants. Specifically, on August 1, 2022, the Court set a hearing on five motions: TQ Delta's First Motion to Compel Deposition from Nokia (Dkt. No. 199); Defendants Nokia Corp., Nokia Solutions and Networks Oy, and Nokia of America Corp.'s (collectively, "Nokia") Motion to Compel Discovery from TQ Delta (Dkt. No. 201); TQ Delta's First Motion to Compel Discovery from CommScope (Dkt. No. 234); and TQ Delta's Second Motion to Compel Discovery from CommScope (Dkt. No. 239). (Dkt. No. 240). On August 17, 2022, the Court added TQ Delta's First Motion to Compel Expert Depositions and Disclosure from Nokia (Dkt. No. 255) to the hearing. (Dkt. No. 260). On August 26, 2022, the Court added TQ Delta's Sixth Motion to Compel (Dkt. No. 271) to the hearing.

Also on August 26, 2022, the Central District of California transferred to this Court Nokia's Motion to Compel Out-of-District Subpoenas Against ZyXEL Communications, Inc. ("ZCI"). *In Re Subpoena to ZyXEL Communications, Inc.*, Case No. 2:22-mc-168-FMO, ECF No. 13 (C.D. Cal August 26, 2022). In that order, the court referenced this Court's "preference to address all pending discovery issues together." *Id.* at 5. Accordingly, Defendants believe that it would be worthwhile to hear its narrowing motion together with the discovery issues.

Indeed, Defendants' Second Opposed Motion for Entry of Order Focusing Patent Claims (Dkt. 243) is ripe for review as all briefing is complete. *See* Dkt. Nos. 243, 256, 261, and 269. Accordingly, in the interest of efficiency, Defendants respectfully request that their narrowing motion be considered in conjunction with the presently scheduled hearing.

Dated: August 30, 2022

Respectfully submitted,

/s/ M. Scott Stevens

M. Scott Stevens (NC Bar # 37828)  
Kirk T. Bradley (NC Bar # 26490)  
Karlee Wroblewski (NC Bar # 55043)  
Nic Marais (NC Bar # 53533)  
ALSTON & BIRD LLP  
One South at the Plaza  
101 South Tryon Street, Suite 4000  
Charlotte, North Carolina 28280  
Tel: 704.444.1000  
Fax: 704.444.1111  
Email: [scott.stevens@alston.com](mailto:scott.stevens@alston.com)  
Email: [kirk.bradley@alston.com](mailto:kirk.bradley@alston.com)  
Email: [karlee.wroblewski@alston.com](mailto:karlee.wroblewski@alston.com)  
Email: [nic.marais@alston.com](mailto:nic.marais@alston.com)

John D. Haynes (GA Bar # 340599)  
Michael Deane (GA Bar # 498195)  
Katherine M. Donald (GA Bar # 753449)  
ALSTON & BIRD LLP  
One Atlantic Center  
1201 West Peachtree Street  
Suite 4900  
Atlanta, GA 30309  
Tel: 404.881.7737  
Fax: 404.881.7777  
Email: [john.haynes@alston.com](mailto:john.haynes@alston.com)  
Email: [michael.deane@alston.com](mailto:michael.deane@alston.com)  
Email: [katie.donald@alston.com](mailto:katie.donald@alston.com)

Darlana Subashi (NY Bar # 5780747)  
ALSTON & BIRD LLP  
90 Park Avenue  
New York, NY 10016  
Tel: 212-210-9400  
Fax: 212-210-9444  
Email: [darlena.subashi@alston.com](mailto:darlena.subashi@alston.com)

Adam Ahnhut (TX Bar # 24106983)  
ALSTON & BIRD LLP  
Chase Tower  
2200 Ross Avenue, Suite 2300  
Dallas, TX 75201

Email: adam.ahnhut@alston.com  
Tel: 214.922.3400  
Fax: 214.922.3899

*Counsel for Defendants  
Nokia Corporation, Nokia Solutions  
and Networks Oy, and Nokia  
of America Corporation*

By: /s/ Andrew Ong  
Eric H. Findlay  
State Bar No. 00789886  
Brian Craft  
State Bar No. 04972020  
FINDLAY CRAFT, P.C.  
102 N. College Ave, Ste. 900  
Tyler, TX 75702  
903-534-1100 (t)  
903-534-1137 (f)  
efindlay@findlaycraft.com  
bcraft@findlaycraft.com

Douglas J. Kline  
Christie Larochelle  
GOODWIN PROCTER LLP  
100 Northern Avenue  
Boston, MA 02210  
P: (617) 570-1000  
F: (617) 523-1231  
dkline@goodwinlaw.com  
clarochelle@goodwinlaw.com

Brett Schuman  
Rachel M. Walsh  
GOODWIN PROCTER LLP  
Three Embarcadero Center, 28th Floor  
San Francisco, CA 94111  
P: (415) 733-6000  
F: (415) 677-9041  
bschuman@goodwinlaw.com  
rwalsh@goodwinlaw.com

Andrew Ong  
GOODWIN PROCTER LLP  
601 Marshall St.  
Redwood City, CA 94063

P: (650) 752-3100  
F: (650) 853-1038  
aong@goodwinlaw.com

*Attorney for Defendants CommScope  
Holding Company, Inc., CommScope Inc.,  
ARRIS International Limited, ARRIS Global  
Ltd., ARRIS US Holdings, Inc., ARRIS  
Solutions, Inc., ARRIS Technology, Inc.,  
ARRIS Enterprises, LLC*

**CERTIFICATE OF SERVICE**

I hereby certify that the foregoing document was served electronically on August 30, 2022,  
on all counsel who have consented to electronic service.

/s/ M. Scott Stevens

M. Scott Stevens